



DAVID G. HOSENPUD
503.778.2141
hosenpudd@lanepowell.com

February 10, 2021

The Honorable Louis L. Stanton
United States District Judge
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

Re: *Frontier Airlines v. AMCK Aviation, et al.*
Case No. 1:20-cv-09713-LLS

Dear Judge Stanton:

This office along with Binder & Schwartz LLP represent the Plaintiff in the above-referenced action. We write with the consent of counsel for Defendants to request the Court approve the following schedule to which the parties have agreed.

February 26, 2021: Deadline for Plaintiff either to file its brief in opposition to Defendants' Partial Motion to Dismiss, or to amend its complaint pursuant to Local Civil Rule 6.1(b) and Fed. R. Civ. P. 15(a)(1)(B).

March 12, 2021: Deadline for Defendants to file their reply brief, if plaintiff files an opposition to Defendants' partial motion to dismiss.

April 9, 2021: Deadline for Defendants' to answer or otherwise move with respect to the amended complaint, if Plaintiff files an amended complaint.

The current deadline for Frontier to respond to Defendants' partial motion to dismiss is February 12, 2021, pursuant to Local Civil Rule 6.1(b). Defendants' deadline to reply would normally be seven days after service of the opposition brief. *Id.* The current deadline to file an amended complaint as a matter of right is February 19, 2021, pursuant to Fed. R. Civ. P. 15(a)(1)(B). In the event an amended complaint is filed, the deadline to respond would normally be fourteen days after service. *Id.* at 15 (a)(3).

The Honorable Louis L. Stanton
February 10, 2021
Page 2

This is the first request for an extension of the Response and Reply deadlines for the Partial Motion to Dismiss, or the deadline to file an amended complaint, and the Defendants' appearance with respect to any such amended complaint.

Very truly yours,

LANE POWELL PC

s/David G. Hosenpud

David G. Hosenpud

cc: Counsel of Record (via ECF)

022510.0155/8355466.3